

### REMARKS

Applicants respectfully request reconsideration of this application as amended. Claims 1-43 are pending in the application. Claims 1, 8, 13, 17-20, 23, 25-27, 32, 35, 38-39, and 41-43 have been amended. No claims have been added. Claims 9-12 and 28-31 have been cancelled.

The Examiner has rejected Claims 9-12 and 28-31 under 35 U.S.C. §112, first paragraph, as failing to comply with the enable requirement, stating that the claims contain subject matter which was not described in the specification in such a way as to enable one skilled in the art to which it pertains. More specifically, the Examiner stated that the specification does not clearly define “integer programming,” dynamic programming,” approximate linear programming solution,” or “approximate maximum entropy solution.” Applicants respectfully submit that these terms are well known in the art, particularly those familiar with the art of halftoning. Furthermore, the Examiner stated that it is not clear what “L1” or “sup norm” refer to. Each of these terms are norms that are well known in the art. “L1” refers to the L1-norm, which may be written  $L_{1\text{-norm}}$ , and is a vector norm. “Sup norm” or “sup-norm” may be referred to as the uniform norm. This is again a norm for use in the vector space. Applicants have included a couple of web printouts with definitions for each of these well-known norms to better educate the Examiner with respect to norms. Thus Applicants respectfully submit that the terminology objects to whether the Examiner is well known in the art. Even so, Applicants have amended Claims 9-12 and 28-31 to obviate the rejection.

Applicants have amended the claims, particularly to overcome the Examiner's rejection of indefiniteness under 35 U.S.C. §112 and to more clearly distinguish the invention from the prior art cited. The Examiner initially rejected claims 8, 13-15, 17-18, 23-27, and 42 under 35 U.S.C. §112, second paragraph. Accordingly, Applicants have amended claims 1, 8, 13, 17-20, 23, 25-

27, 32, 35, 38-39, and 41-43 to particularly point out and distinctly claim, in full, clear, concise and exact terms, the subject matter which Applicants regard as their invention.

The Examiner rejected Claims 1-5, 19-24, 38-39, 41, and 43 under 35 U.S.C. §102(b) as being anticipated by Rafferty. The Examiner also indicated that the subject matter of claim 16 included allowable subject matter. Applicants have amended Claim 1 to include a substantial portion of Claim 16. Therefore, in view of Applicants amendments, Applicants respectfully submit that Claim 1 is not anticipated by Rafferty.

Applicants made similar amendments to Claims 19, 20 and 38. Therefore, for the same reason given above with respect to Claim 1, the present invention as claimed in those claims, and those claims that depend from those claims, are not anticipated by Rafferty and are in condition for allowance.

Applicants also amended Claims 13 and 32 to include substantially all the limitations of the independent claim and any intervening claims. The Examiner had indicated that these claims would be allowable. In view of this, Applicants respectfully request the Examiner to indicate that Claims 13 and 32, and any dependent claim from these two claims, are in condition for allowance.

The Examiner also rejected claims 1, 4-6, 20, and 22-25 under 35 U.S.C. §102(e) as being anticipated by Pan et al. Applicants respectfully reserve the right to swear behind Pan. Applicants respectfully submit, for the same reasons given above, with respect to Rafferty, the present invention as claimed is not anticipated by Pan.

With respect to Claims 39-43, the claims include the limitation that the computation of the set of output colors is done as a part of a halftoning process. Rafferty clearly sets forth a compression/decompression process. Therefore, Rafferty does not disclose computation of a set

of output colors as part of a halftoning process. Thus, the present invention as claimed in Claims

39-43 is not anticipated by Rafferty.

The Examiner rejected Claims 7, 8, 26, and 27 under 35 U.S.C. §103(a) as being unpatentable under Pan et al. Applicants respectfully submit for the same reason as discussed above with respect to Claim 1, the present invention as claimed is not obvious in view of Pan.


Accordingly, Applicants respectfully submit that the rejections under 35 U.S.C. §102 and §103 have been overcome by the amendments and the remarks and withdrawal of these rejections is respectfully requested. Applicants submit that Claims 1-8, 13-27, and 32-43, as amended, are now in condition for allowance and such action is earnestly solicited.

Please charge any shortages and credit any overcharges to our Deposit Account No. 02-2666.

Respectfully submitted,

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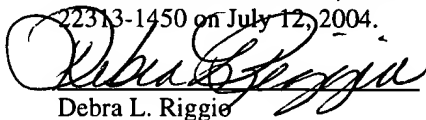
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I hereby certify that this correspondence is being deposited with the United States Postal Service as first class mail with sufficient postage in an envelope addressed to the Commissioner for Patents, P.O. Box 1450, Alexandria, VA 22313-1450 on July 12, 2004.

  
Debra L. Riggie

7/12/2004  
Date